

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 97 of the Commission's	)	RM-10811
Amateur Radio Service Rules	)	
	)	
	)	
	)	
To: The Commission	)	

**Comments Of Christopher Robison**

**I am opposed to this petition in its entirety.**

I am currently licensed as a technician class amateur operator.

While I commend the members of the FISTS CW Club for as they state in their petition that *the mission of FISTS is to further the use of Morse Code (CW) on the amateur bands, to welcome newcomers to the CW mode and to engender friendship among its members*. From their own filling it is also commendable that they sponsor awards and contests along with doing many other activities to support the mode of CW communications. I do find that their position is contrary to their own statements in that by proposing that testing requirements for both Morse code and written exams be increased which to me appears to be just the opposite of encouraging more people to become involved in amateur radio. It would seem to me that such a fine organization would be one of the first ones that you would expect to step forward to encourage changes in the licensing requirements that would first bring more people into the hobby, and therefore increase the pool of license holders that they could then encourage to become active on CW. The purpose of the testing requirements for an amateur license are to show that a minimum level of knowledge is present to allow that applicant to receive their license not to prove that they are an "expert" in the field before receiving the license.

In their own filing, the statement in reference to the results of the poll that they conducted in July 2003 *of the United States membership by mail in ballot* resulting in an overwhelming consensus preferring to maintain or increase the morse code testing requirement; I have to ask one thing, since the stated purpose of the club is for the advancement of CW and the membership is comprised of individuals that have a special interest in morse code, is it any wonder that they received the kind of response that they now hold out as being "the will of the amateur community in it's entirety"? If a poll of the membership of the NRA were conducted would one expect the results to be in favor or against gun control? Therefore the value of their poll becomes very suspect as to what if any weight should be applied to the results in reference to this petition.

### **Now to my more specific proposals and position on this issue:**

After reviewing the various requests for rule making fillings, reading many of the comments posted to date, discussion with other amateur radio operators in my area, and considering the wide range of opinions and feelings on these topics I have come to the conclusion that this issue breaks down in to several different view points that no matter what is decided there will be people unhappy with the outcome.

Many good points are made both for and against removing the testing requirement for Morse code. The arguments range across the board from one extreme to the other. There have been proposals put forward to remove Morse code entirely to going back to the older style of graduated testing with increasing levels for each class of license. There have been comments made that the written test should also under go changes. There have been proposals that there should be changes made to operating frequencies and privileges of the various classes.

What I would like to have you consider is a fairly straight forward proposal that could be a fair compromise between all the various camps of opinion that are out there on this topic.

1. Streamline the classes of operator privileges to only 3 classes, those being Technician, General, and Extra. This would involve the gradual phasing out of all other classes of license holder where they would be required to transition to whichever class of license that they qualify for at the time of their next renewal. This would in time result in much less confusion as to the different types of licenses and make the work of the FCC much easier to maintain the database with only the three classes of license holder.
2. Graduated testing for each of the classes of license with the following as a rough guideline:
  - a. Technician: Written test covering basic technical topics, rules and regulations and operating procedures.
  - b. General: Written test covering more advanced technical topics, more coverage of rules and regulations and additional operating procedures
  - c. Extra: Morse code testing at 5 words per minutes both send and receive, along with a written test on more advanced technical topics, rules and regulations, and operating procedures.
3. With the elimination of the current testing requirement I would propose that no additional privileges be granted without passing the requirements of the testing structure as listed in item #2. In other words, if currently a technician license holder they would still be required to take the general test to move into the HF bands and not granting them the Technician Plus type privileges as so many have proposed. Those who have privileges as a Tech Plus would retain them until the next renewal time where they would then have the choice to drop to the straight technician level or pass the general written test to move up.

4. I propose absolutely no changes in the current band plans, leave the morse code sub-bands as they are, therefore protecting the band space for those that do enjoy operations in that mode.

These changes as outlined above are a reasonable compromise between the various viewpoints that have been presented from both extremes of this topic. It provides for those that are not in favor of Morse code the chance to move up into the HF bands while at the same time protecting the tradition and prestige of those that are willing to take the time to learn Morse code to move all the way up to Extra class. The changes in the written test can be phased in as each test is re-evaluated to insure the proper level of knowledge required for qualified operators at each level. This would then serve to protect the amateur service from being degraded by under qualified persons from entering the various license classes. As a further point to maintain the higher level of operation to insure that the amateur service does not spiral down to the level of citizen's band as many fear it might also be considered that a license holder would have to retest for their license at each renewal time.

Thank you for taking the time to consider my comments.

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